



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

December 6, 2016

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0066

FROM: (b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)
Special Agent, Hotline Manager
Headquarters, Office of Inspector General

TO: Francesca Grifo
Scientific Integrity Official

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received an electronic message from (b) (6), (b) (7)(C). The message is alleging a loss of scientific integrity with regards to the actions of (b) (6), (b) (7)(C), Office of Research and Development, US Environmental Protection Agency. This is in regards to actions (b) (6), (b) (7)(C) has taken with respect to the US EPA's final Hydraulic Fracturing Drinking Water Assessment.

The Hotline forwarded the attached message to the EPA, OIG, Office of Program Evaluation (OPE). OPE reviewed the complaint and recommended that it be forwarded to your office.

We established EPA OIG Hotline Number 2017-0066. We are referring this matter to your office for whatever action you determine necessary. Please inform the Hotline at (b) (6), (b) (7)(C) within the next 5 calendar days that this referral was received. In addition, it requested that any action from this Hotline be reported back to the OIG. Please do not hesitate calling me at (202) 566-(b) (6) if there are any questions.

Attachment:

(b) (6), (b) (7)

From: (b) (6), (b) (7)(C)
Sent: Tuesday, November 22, 2016 4:11 PM
To: OIG Hotline
Subject: loss of scientific integrity complaint
Attachments: OIG Complaint HFDWA--signed.pdf

My name is (b) (6), (b) (7)(C), and I have attached a complaint alleging a loss of scientific integrity with regards to the actions of (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), Office of Research and Development, US Environmental Protection Agency. This is in regards to actions (b) (6), (b) (7)(C) has taken with respect to the US EPA's final Hydraulic Fracturing Drinking Water Assessment.

The full allegation can be found in the attached document.

Complaint

1. I, (b) (6), (b) (7)(C), bring forth this scientific integrity and abuse complaint against (b) (6), (b) (7)(C), Office of Research and Development, US Environmental Protection Agency. (b) (6), (b) (7) the final Hydraulic Fracturing Drinking Water Assessment (HFDWA), an official Agency report of the US Environmental Protection Agency (EPA).

Introduction

2. (b) (6), (b) (7)(C)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
3. (b) (6), (b) (7) has abused the public trust by acting in violation of the US EPA Scientific Integrity Policy and through abuse of (b) office. Specifically, from 7 November 2016 through the present (b) (6), (b) has:
 - a. Engaged in Scientific Misconduct, specifically multiple counts of plagiarism (b) (6), (b) (7)(C)
[Redacted]
[Redacted]
[Redacted]
 - b. Engaged in Scientific Misconduct, specifically by preventing (b) (6), (b) (7)(C)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
 - c. Engaged in Scientific Misconduct, specifically disenfranchising (b) (6), (b) (7)(C)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
4. (b) (6), (b) 's actions as an (b) (6), (b) (7)(C) are unheard of and violate the authorship norms of (b) (6), (b) (7)(C) as an organization. (b) (6), (b) (7)(C)
[Redacted]. (b) (6), (b) 's hostile, abusive, and negligent actions break precedent within the EPA and certainly within (b) (6), (b) (7)(C)
[Redacted]
[Redacted]

(b) (6), (b) (7)(C)

[Redacted text block]

Factual Allegations

5. (b) (6), (b) (7)(C)
- [Redacted text block]

excluded as authors of the final HFDWA on the basis of (b) analysis that (b) did not meet the criteria for authorship in the US EPA's authorship guidelines. Specifically, (b) (6), (b) stated:

(b) (6), (b) (7)(C)

[Redacted text block]

6. (b) (6), (b) (7)(C)
- (b)

(b) (6), (b) (7)(C)



7. (b) (6), (b) (7)(C)



8. According to the US EPA website, contacting the OIG is one mechanism to report an allegation of scientific misconduct.

Factual Allegations

9. (b) (6), (b) (7)(C)

10. (b) (6), (b) (7)(C)

11. (b) (6), (b) (7)(C)



12.
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(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Where Else Has This Allegation Been Submitted

I have not submitted this allegation elsewhere. I have contemplated submitting it to the Office of Special Counsel, but I decided to send it to the EPA OIG instead.

(b) (6), (b) (7)(C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

February 3, 2017

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0122

FROM: (b) (6), (b) (7)(C) [REDACTED]
(b) (6), (b) (7)(C) [REDACTED]
Special Agent, Hotline Manager
Headquarters, Office of Inspector General

TO: Francesca Grifo
Scientific Integrity Official

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received an electronic message from (b) (6), (b) (7)(C) [REDACTED] on January 26, 2017. The message is requesting that the EPA OIG investigate mismanagement and failure to apply the EPA's Science Integrity. The Hotline reviewed the message and determined that it should be referred to your office.

We established EPA OIG Hotline Number 2017-0122. We are referring this matter to your office for whatever action you determine necessary. Please inform the Hotline at (b) (6), (b) (7)(C) [REDACTED] within the next 5 calendar days that this referral was received. In addition, it requested that any action from this Hotline be reported back to the OIG. Please do not hesitate calling me at (202) 566-(b) (6) [REDACTED] if there are any questions.

Attachment:

(b) (6), (b) (7)

From: (b) (6), (b) (7)(C)
Sent: Thursday, January 26, 2017 3:43 PM
To: OIG Hotline
Subject: Please Investigate Mismanagement and Failure to Apply the EPA's Policy on Scientific Integrity

Inspector General,

Recent public statements made by EPA (b) (6), (b) (7)(C) suggest that the (b) (6), (b) (7)(C) is flagrantly violating the EPA's 2012 Policy on Scientific Integrity. I am writing to ask that you begin an immediate investigation into this matter to ensure that the public can continue to trust scientific information disseminated by the Agency.

(b) (6), (b) (7) was quoted (b) (6), (b) (7)(C)

This is clearly in violation of the Policy on Scientific Integrity which explicitly "prohibits managers and other Agency leadership from intimidating or coercing scientists to alter scientific data, findings, or professional opinions or inappropriately influencing scientific advisory boards."

While investigating (b) (6), (b) (7), I urge you to explore whether (b) (6), (b) (7)(C) Presidential Transition members or Agency officials have also violated this policy. Please also investigate whether the implementation of this gag order has also violated federal whistleblower protection standards by failing to remind EPA employees of their rights under the Whistleblower Protection Enhancement Act.

Thanks for your time and consideration.

Sincerely,

(b) (6), (b) (7)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

March 29, 2017

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0182

FROM: (b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)
Special Agent, Hotline Manager
Headquarters, Office of Inspector General

TO: Francesca Grifo
Scientific Integrity Official

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received a letter dated March 14, 2017, from Elena Saxonhouse, Senior Attorney, Sierra Club. The letter is requesting an investigation into the EPA Administrator's violations of the EPA's Science Integrity Policy. Allegedly, the Administrator recent public statements contradicted international science consensus on climate change. The eight-page letter is attached and provides specific concerns regarding this request for investigation.

The Hotline forwarded this letter as Hotline 2017-0165 to the EPA, OIG, Office of Counsel (OC), for review. After discussion with the Inspector General, the IG determined that the Hotline should refer this letter to your office. In addition, the Hotline has informed the Sierra Club of the referral to your office. If after your review, there is some aspect of the letter itself, or your findings or conclusions that you believe are appropriate for further consideration by the OIG, please notify me.

We established EPA OIG Hotline Number 2017-0182. We are referring this matter to your office for whatever action you determine necessary. Please inform the Hotline at (b) (6), (b) (7)(C) within the next 5 calendar days that this referral was received. In addition, it requested that any action from this Hotline be reported back to the OIG. Please do not hesitate calling me at (202) 566-(b) (6) if there are any questions.

Attachment:

(b) (6), (b) (7)

From: Elena Saxonhouse <elena.saxonhouse@sierraclub.org>
Sent: Tuesday, March 14, 2017 2:40 PM
To: OIG Hotline
Cc: Joanne Spalding
Subject: Sierra Club Scientific Integrity Complaint re: Administrator Pruitt
Attachments: Sierra Club Scientific Integrity Complaint 3-14-17.pdf

Please see the attached letter regarding violations of the EPA's Scientific Integrity Policy by Administrator Scott Pruitt. The EPA's website and 2014 Scientific Integrity Annual Report indicate that complaints of a loss of scientific integrity may be submitted to your office. See <https://www.epa.gov/osa/basic-information-about-scientific-integrity> ("To report an allegation of the loss of scientific or scholarly integrity, submit it in writing to the Scientific Integrity Official (SciO), one of the Deputy Scientific Integrity Officials (DSciOs), or the Office of Inspector General."); Environmental Protection Agency, Scientific Integrity – Annual Report FY 2014, at 10-13, https://www.epa.gov/sites/production/files/2015-04/documents/annual_report_scientific_integrity_2014_final_pages.pdf.

Please keep me updated on the status of the attached request and do not hesitate to contact me for further information. Thank you.



Elena Saxonhouse
Senior Attorney
Sierra Club - Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612
Phone: [415-977-5765](tel:415-977-5765)



Sierra Club - Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612

Office of the Inspector General
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W. (2410T)
Washington, DC 20460

Submitted via E-mail to OIG_Hotline@epa.gov

March 14, 2017

Re: Violation of Scientific Integrity Policy by Administrator Scott Pruitt

Dear Inspector General Elkins:

On behalf of the Sierra Club and its 2.7 million members and supporters, we write to request an inquiry into Administrator Pruitt's recent public statements contradicting the international scientific consensus on climate change, which violate the U.S. Environmental Protection Agency's Scientific Integrity Policy.¹ We respectfully urge you to investigate and remedy this violation as soon as possible to prevent further erosion of scientific integrity at the agency.²

I. Circumstances of the Violation

On March 9, 2017, during a CNBC interview televised throughout the world, Administrator Pruitt was asked, "Do you believe that it's been proven that carbon dioxide ["CO₂"] is the primary control knob for climate?" He responded:

No. I think that measuring with precision human activity on the climate is something very challenging to do and there's tremendous disagreement about

¹U.S. Environmental Protection Agency Scientific Integrity Policy (2012) (hereinafter "Policy"), https://www.epa.gov/sites/production/files/2014-02/documents/scientific_integrity_policy_2012.pdf.

²The EPA's website and 2014 Scientific Integrity Annual Report indicate that complaints of a loss of scientific integrity may be submitted to your office. See Reporting an Allegation of a Loss of Scientific Integrity, <https://www.epa.gov/osa/basic-information-about-scientific-integrity> ("To report an allegation of the loss of scientific or scholarly integrity, submit it in writing to the Scientific Integrity Official (ScIO), one of the Deputy Scientific Integrity Officials (DSclOs), or the Office of Inspector General."); Environmental Protection Agency, *Scientific Integrity – Annual Report FY 2014*, at 10-13, https://www.epa.gov/sites/production/files/2015-04/documents/annual_report_scientific_integrity_2014_final_pages.pdf.

the degree of impact. So no, I would not agree that it's a primary contributor to the global warming that we see. But we don't know that yet . . . We need to continue the debate and continue the review and the analysis.³

This exchange appeared on the show Squawk Box, which CNBC describes as "the ultimate 'pre-market' morning news and talk program, where the biggest names in business and politics tell their most important stories. . . [T]he show brings Wall Street to Main Street. It's a 'must see' for everyone from the professional trader to the casual investor."⁴ The show airs in the United States, Australia, Asia, Europe, the Middle East, and Africa.⁵

II. Administrator Pruitt's Statements Undermine EPA's Scientific Integrity.

Administrator Pruitt's televised statements contradict decades of work by international scientific institutions and federal agencies, including EPA, that have found CO₂ to be a primary cause of global warming. Coming from the head of EPA in a major public forum, these statements undermine and delegitimize established climate science. They represent a significant loss of scientific integrity at the agency.

Administrator Pruitt's comments are not only erroneous, but appear to be politically motivated. Administrator Pruitt has long opposed the regulation of carbon dioxide,⁶ as have the fossil fuel interests that have made large donations to his campaign and have been his close allies in the past.⁷ While Administrator Pruitt is free to advocate for policy changes, he may not do so while distorting the basic science underlying the policy he opposes.

³ A video clip of the full interview is available at <http://www.businessinsider.com/scott-pruitt-climate-change-2017-3> (last visited March 13, 2017).

⁴ CNBC Squawk Box, <http://www.cnbc.com/squawk-box-us/>

⁵ *Id.*

⁶ Scott Pruitt & Luther Strange, *The Climate Change Gang*, NATIONAL REVIEW (May 17, 2016), <http://www.nationalreview.com/article/435470/climate-change-attorneys-general>; Bobby McGill, *Donald Trump picked Oklahoma AG Scott Pruitt, a climate denier, to run the Environmental Protection Agency*, SALON (Dec. 7, 2016), <http://www.salon.com/2016/12/07/donald-trump-picked-oklahoma-ag-scott-pruitt-a-climate-denier-to-run-the-environmental-protection-agency/>

⁷ Brady Dennis & Steve Mufson, *Thousands of emails detail EPA head's close ties to fossil fuel industry*, WASHINGTON POST (Feb. 22, 2017), <https://www.washingtonpost.com/news/energy-environment/wp/2017/02/22/oklahoma-attorney-generals-office-releases-7500-pages-of-emails-between-scott-pruitt-and-fossil-fuel-industry/>; Alex Guillen & Esther Whieldon, *Energy executives, secretive nonprofit raise money to back Pruitt*, POLITICO (Jan. 6, 2017), <http://www.politico.com/story/2017/01/scott-pruitt-epa-nonprofit-backers-233306>; Coral Davenport & Eric Lipton, *Trump Picks Scott Pruitt, Climate Change Denialist, to Lead E.P.A.*, NEW YORK TIMES (Dec. 7, 2016), <https://www.nytimes.com/2016/12/07/us/politics/scott-pruitt-epa-trump.html>; Eric Lipton, *Energy Firms in Secretive Alliance With Attorneys General* (Dec. 6, 2014), NEW YORK TIMES, <https://www.nytimes.com/2014/12/07/us/politics/energy-firms-in-secretive-alliance-with-attorneys-general.html>.

A. Administrator Pruitt Misrepresented Established Scientific Facts to the Public and the News Media.

Administrator Pruitt's claim that CO₂ is not a "primary contributor" to global warming is false. EPA's 2009 Endangerment Finding, which was based on a comprehensive review of climate science, found that carbon dioxide is a primary contributor to climate change, endangering the public health and welfare of current and future generations.⁸

The Endangerment Finding was based in large part on the agency's independent review of the scientific assessments undertaken by the Intergovernmental Panel on Climate Change (IPCC), which was established by the World Meteorological Organization and the United Nations Environment Programme. Through the IPCC, climate experts from around the world synthesize the most recent climate science findings every five to seven years and present their report to the world's political leaders. The IPCC ensures exceptional scientific credibility through an exhaustive and transparent process of peer-review in which the assessments are developed and accepted by its members. This process is more extensive than most scientific journals. The IPCC also explicitly includes a process for incorporating the views of experts across the spectrums, including climate change contrarians.⁹ EPA also reviewed and incorporated the findings of domestic scientific entities, the U.S. Global Change Research Program and the National Research Council.¹⁰

EPA's website explains its findings on CO₂ to the public as follows:

Carbon dioxide is the primary greenhouse gas that is contributing to recent climate change. . . Human activities, such as the burning of fossil fuels and changes in land use, release large amounts of CO₂, causing concentrations in the atmosphere to rise.¹¹

While CO₂ emissions come from a variety of natural sources, human-related emissions are responsible for the increase that has occurred in the atmosphere since the industrial revolution.¹²

...

⁸ Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act ("Endangerment Finding"), 74 Fed. Reg. 66,496 (Dec. 15, 2009).

⁹ Union of Concerned Scientists, *The IPCC: Who Are They and Why Do Their Climate Reports Matter?*, http://www.ucsusa.org/global_warming/science_and_impacts/science/ipcc-background.html.

¹⁰ 74 Fed. Reg. at 66,510-66,512.

¹¹ EPA, Greenhouse Gas Emissions, <https://www.epa.gov/ghgemissions/overview-greenhouse-gases#carbon-dioxide>.

¹² *Id.*

Recent climate changes . . . cannot be explained by natural causes alone. Research indicates that natural causes do not explain most observed warming, especially warming since the mid-20th century. Rather, it is extremely likely that human activities have been the dominant cause of that warming.

...

Since the Industrial Revolution began around 1750, human activities have contributed substantially to climate change by adding CO₂ and other heat-trapping gases to the atmosphere. These greenhouse gas emissions have increased the greenhouse effect and caused Earth's surface temperature to rise. The primary human activity affecting the amount and rate of climate change is greenhouse gas emissions from the burning of fossil fuels.¹³

Administrator Pruitt's statements thus not only contradict established science, but also the EPA's efforts to communicate that science to the public.

In 2012, the U.S. Court of Appeals for the D.C. Circuit resoundingly upheld the Endangerment Finding, including EPA's approach to the underlying science.¹⁴ Although state and industry petitioners "challenge[d] the adequacy of the scientific record underlying the Endangerment Finding, objecting to both the type of evidence upon which EPA relied and EPA's decision to make an Endangerment Finding in light of what Industry Petitioners view[ed] as significant scientific uncertainty," the Court held that "[n]either objection ha[d] merit."¹⁵

Since EPA issued and litigated the Endangerment Finding, the evidence that human activity causes climate change has become even more compelling, and accordingly, scientific consensus on carbon dioxide's contribution to a warming planet remains strong.¹⁶ The IPCC's 5th Assessment Report, published in 2014, concluded:

Continued emission of greenhouse gases will cause further warming and long-lasting changes in all components of the climate system, increasing the likelihood of severe, pervasive and irreversible impacts for people and ecosystems. Limiting climate change would require substantial and sustained reductions in greenhouse gas emissions which, together with adaptation, can limit climate change risks.¹⁷

¹³ EPA, Climate Change Science, <https://www.epa.gov/climate-change-science/causes-climate-change>.

¹⁴ *Coalition for Responsible Regulation, Inc. v. EPA*, 684 F.3d 102, rev'd in part on other grounds, *UARG v. EPA*, 134 S. Ct. 2427 (2014) (D.C. Cir. 2012). See also *Massachusetts v. EPA*, 549 U.S. 497, 534 (2007).

¹⁵ *Coalition for Responsible Regulation, Inc.*, 684 F.3d at 119.

¹⁶ See Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units; Final Rule, 80 Fed. Reg. 64,662, 64,683-64,688 (Oct. 23, 2015) (hereinafter "Clean Power Plan"); U.S. Global Change Research Program, Climate Change Impacts in the United States, U.S. National Climate Assessment (2014).

¹⁷ IPCC, Climate Change 2014 Synthesis Report Summary for Policymakers at 8, http://www.ipcc.ch/pdf/assessment-report/ar5/syr/AR5_SYR_FINAL_SPM.pdf.

Administrator Pruitt's statement that "we don't know . . . yet" whether carbon dioxide is a primary contributor to climate change, and that there is an ongoing "debate" on this question, is wholly inconsistent with the actual level of consensus concerning climate science.

As explained by the American Meteorological Society in a letter to Administrator Pruitt following his remarks, "In reality, the world's seven billion people are causing climate to change and our emissions of carbon dioxide and other greenhouse gases are the primary cause. This is a conclusion based on the comprehensive assessment of scientific evidence. It is based on multiple independent lines of evidence that have been affirmed by thousands of independent scientists and numerous scientific institutions around the world. We are not familiar with any scientific institution with relevant subject matter expertise that has reached a different conclusion."¹⁸

In issuing the Clean Power Plan, EPA reviewed numerous major climate assessments released after the Endangerment Finding, and found that "[t]he findings of the recent scientific assessments confirm and strengthen the conclusion that GHGs endanger public health, now and in the future."¹⁹

Likewise, in 2016, seven climate experts published a paper reviewing studies on the scientific consensus on climate change and found that:

- 1) Somewhere between 90% and 100% that agree humans are responsible for climate change, with most of the studies finding 97% consensus among publishing climate scientists.
- 2) The greater the climate expertise among those surveyed, the higher the consensus on human-caused global warming.²⁰

These conclusions demonstrate that the statements by Administrator Pruitt grossly misrepresented the state of scientific certainty as to carbon dioxide's influence on the climate.

III. Administrator Pruitt's Misrepresentation of Science Violates the Scientific Integrity Policy.

The above evidence is sufficient to find that Administrator Pruitt has violated the EPA's Scientific Integrity Policy. The Policy, adopted in 2012, applies to all EPA employees, including political appointees. It applies to a range of official activities, including "communicating

¹⁸ Letter from K. Seitter, Executive Director, American Meteorological Society, to Administrator Pruitt (Mar. 13, 2017), <https://www.ametsoc.org/ams/index.cfm/about-ams/ams-position-letters/letter-to-epa-administrator-pruitt-on-climate-change/>.

¹⁹ Clean Power Plan, 80 Fed. Reg. at 64,683 (Oct. 23, 2015).

²⁰ Cook et al, *Consensus on consensus: a synthesis of consensus estimates on human-caused global warming*, ENV. RSCH. LETTERS 11:4 (April 13, 2016).

information in an official capacity about Agency scientific activities.”²¹ The Policy “is intended to outline the Agency’s expectations for developing *and communicating* scientific information to the public, to the scientific community, to Congress, and to the news media by further providing for and protecting the EPA’s longstanding commitment to the timely and unfiltered dissemination of its scientific information – uncompromised by political or other interference.”²²

By stating that carbon dioxide is not a “primary contributor” to global warming, remaining silent on the scientific consensus to the contrary, and exaggerating the disagreement among scientists, Administrator Pruitt’s statements violate each of the following principles set forth by EPA’s Scientific Integrity Policy:

- “When dealing with science, it is the responsibility of every EPA employee to conduct, utilize, and communicate science with honesty, integrity, and transparency, both within and outside the Agency.” (p. 1)
- “[P]olicy makers shall not knowingly misrepresent, exaggerate, or downplay areas of scientific uncertainty associated with policy decisions.” (p. 5)
- “To operate an effective science and regulatory agency like the EPA, it is also essential that political or other officials not suppress or alter scientific findings.” (p. 1)

Administrator Pruitt’s statements fail to communicate the science of climate change with integrity, and exaggerate the uncertainty associated with the EPA’s scientific judgment in the Endangerment Finding and the policy decisions stemming from that finding.

Although Administrator Pruitt may disagree as to the policy of regulating carbon dioxide, policy decisions must be based on sound science and on accurate communication of that science to the public.²³ “[P]olicy judgments . . . have nothing to do with whether greenhouse gas emissions contribute to climate change. Still less do they amount to a reasoned justification for declining to form a scientific judgment.” *Massachusetts v. EPA*, 549 U.S. at 533-34 (2007).

Administrator Pruitt undermines the agency’s mission and its integrity by contradicting basic facts that EPA scientists have studied, verified, and communicated for years. The Scientific Integrity Policy aims not only to protect sound decision-making, but also to engender public

²¹ Policy at 2.

²² Policy at 5.

²³ Policy at 1 (“The Agency’s ability to pursue its mission to protect human health and the environment depends upon the integrity of the science on which it relies. The environmental policies, decisions, guidance, and regulations that impact the lives of all Americans every day must be grounded, at a most fundamental level, in sound, high quality science.”)

trust in the Agency. By misrepresenting his own agency's science, Administrator Pruitt severely threatens that trust.

The harm flowing from this loss of scientific integrity cannot be gainsaid. Climate deniers have spent many crucial years obfuscating science and confusing the public in their effort to stave off essential pollution reduction measures and prolong our reliance on dirty fossil fuels. Unfortunately, this effort has succeeded in delaying an effective response to the climate crisis. The result is that it will be far more difficult and expensive to avoid the worst effects of climate change. In recent years, EPA staff has worked tirelessly to build public trust in the agency and remediate the harm done by climate denialism, developing a robust scientific basis for climate policy decisions while educating the public about the causes and effects of climate change. Administrator Pruitt's remarks undermine the efforts of EPA staff and imperil public confidence in the agency.

His comments cannot be dismissed as mere error when (a) they concern a basic scientific fact that underlies a widely discussed and publicized policy of his own agency, and (b) there is evidence of political motivation. Nor has the Administrator admitted that he erred in the aftermath following his remarks.

In sum, Administrator Pruitt's statements on television, along with his subsequent failure to retract or clarify the statements, amount to "deliberate action by an employee that compromises the scientific integrity of the . . . use of scientific and scholarly . . . assessments" and cause a "loss of integrity . . . in the application of science and scholarship in decision making."²⁴ EPA has stated that it "will not tolerate" such behavior, and we urge you to investigate and correct it.²⁵

IV. Disclosure of Disagreements Between the Sierra Club and Administrator Pruitt.

We provide the following "statement explaining any personal or professional extenuating circumstances, non-scientific disagreements or conflict(s) of interest the person making the allegation has with the subject(s), entity(ies) or situation(s), named in the allegation," as advised by EPA.²⁶

Sierra Club and Administrator Pruitt strongly disagree on many issues and have been opponents in numerous lawsuits that Administrator Pruitt brought against EPA in his role as Oklahoma Attorney General. Sierra Club and its members vigorously opposed Administrator Pruitt's appointment to his current position, in part due to concern about Administrator Pruitt's lack of respect for the scientific consensus on climate change.

²⁴ Reporting an Allegation of a Loss of Scientific Integrity, <https://www.epa.gov/osa/basic-information-about-scientific-integrity>.

²⁵ *Id.*

²⁶ *Id.*

V. Consideration of this Allegation By Other Entities.

At this time, we have not submitted this allegation to any other entity for investigation.

Please keep us updated on the progress of the investigation at the contact information provided below, and do not hesitate to contact us should you require further information.

Thank you for your attention to this important matter. If the deliberate contradiction of EPA scientists by the Agency's head, on a worldwide stage, on an issue as important to the public as global climate change, is not within the scope of the Scientific Integrity Policy, then the policy is worth little to the citizens and scientists it is meant to protect.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Elena Saxonhouse'.

Elena Saxonhouse, Senior Attorney
(415) 977-5765
elena.saxonhouse@sierraclub.org

Joanne Spalding, Chief Climate Counsel
(415) 977-5725
joanne.spalding@sierraclub.org



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

May 9, 2017

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0258

FROM: (b) (6), (b) (7)(C)
Special Agent, (b) (6), (b) (7)(C)
Headquarters, Office of Inspector General

TO: Francesca Grifo
Scientific Integrity Official

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received a letter dated May 5, 2017, from (b) (6), (b) (7)(C), (b) (6), (b) (7)(C). The letter is request for an inquiry into the activities prior to 2017 by the EPA in regards to the Endangerment and the Paris Agreement. The sender wants to know if it violates the EPA's Science Integrity Policy.

We established EPA OIG Hotline Number 2017-0258. We are referring this matter to your office for whatever action you determine necessary. Please inform the Hotline at (b) (6), (b) (7)(C) within the next 5 calendar days that this referral was received. In addition, it requested that any action from this Hotline be reported back to the OIG. Please do not hesitate calling me at (202) 566-(b) (6) if there are any questions.

Attachment:

cc: AIG OPE

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)@gmail.com

May 5, 2017

Office of the Inspector General
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington D.C. 20460

Submitted via E-mail to OIG_Hotline@epa.gov

On behalf of (b) (6), (b) (7)(C) (Requester) and its two individual members engaged in (b) (6), (b) (7)(C) [1], I write to request an inquiry into whether activity prior to 2017 by Administration of U.S. Environmental Protection Agency (EPA) (Pre-2017 Administration) in regard to the Endangerment [2] and Paris Climate Agreement [3] violate the EPA's Scientific Integrity Policy (Policy) [4].

Executive Summary [5]

To be clear, this Request is a blatant demand for investigation as to whether EPA's Policy proscribed Pre-2017 Administration action, or inaction or deferral to others to act, that obfuscated potential United Nations (UN) global taxation of marine fuels contrary to USA principles. [5]

(b) (6), (b) (7)(C)

33 pages of hotline complaint removed pursuant to Exemptions (b)(6) and (b)(7)(C)

(b) (6), (b) (7)
(C)

From: (b) (6), (b) (7)(C)
Sent: Wednesday, July 26, 2017 12:07 PM
To: (b) (6), (b) (7)(C)@epa.gov
Subject: FW: docket EPA-HQ-OPP-2016-0385 (glyphosate SAP) FIFRA---Hotline 207-0299

Your Hotline has been closed. The EPA Office of Inspector General will not be conducting any audit, evaluation, or investigation. Your complaint will be forwarded to the EPA, Science Integrity Official as information only. Thanks for contacting the EPA OIG Hotline.

Special Agent (b) (6), (b) (7)(C)
US EPA, OIG, Office of Investigations HQ
1200 Pennsylvania Ave NW Mailcode 2431T
Washington, DC 20460

Hotline - 202-566-2476 or 888-546-8740
Hotline Fax 202-566-2599 Web Address oig_hotline@epa.gov

Hotline records are protected under the Privacy Act 5 U.S.C. § 552a. All EPA employees handling protected information have a legal and ethical obligation to hold that information in confidence and to actively protect it from improper uses. Except as specifically authorized, EPA employees shall not disclose, directly or indirectly the contents of any record about another individual to any person or organization. EPA employees who willfully release protected information, without authority, may be guilty of a misdemeanor and fined up to \$5,000. In addition, any employee violating the Privacy Act or EPA regulations is subject to disciplinary action, which may result in dismissal.

From: (b) (6), (b) (7)(C)
Sent: Wednesday, July 12, 2017 7:16 PM
To: (b) (6), (b) (7)(C)@epa.gov <(b) (6), (b) (7)(C)@epa.gov>
Subject: RE: docket EPA-HQ-OPP-2016-0385 (glyphosate SAP) FIFRA---Hotline 207-0299

It still in the review process. The Hotline has not been notified of any decision for an assignment.

Special Agent (b) (6), (b) (7)(C)
US EPA, OIG, Office of Investigations HQ
1200 Pennsylvania Ave NW Mailcode 2431T
Washington, DC 20460

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Hotline Fax 202-566-2599 Web Address oig_hotline@epa.gov

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From: (b) (6), (b) (7)(C)@epa.gov [mailto:(b) (6), (b) (7)(C)@epa.gov]
Sent: Wednesday, July 12, 2017 7:08 PM
To: (b) (6), (b) (7)(C)@epa.gov
Subject: Re: docket EPA-HQ-OPP-2016-0385 (glyphosate SAP) FIFRA---Hotline 207-0299

Dear (b) (6), (b) (7)(C),
Thank you for your service.
Do you have any update in the status of my report?

(b) (6), (b) (7)(C)

(b) (6), (b) (7)

Sent from my iPhone (c) 2017 (b) (6), (b) (7)(C)

On Jun 14, 2017, at 3:02 PM, (b) (6), (b) (7) (C) <(b) (6), (b) (7)(C)@epa.gov> wrote:

This email was received. It was assigned Hotline Number 2017-0299. It was forwarded to the EPA, Office of Inspector General, Office of Program Evaluation, for review. This office will report back to the Hotline on how it should be processed. (b) (6)

Special Agent (b) (6), (b) (7)(C)
US EPA, OIG, Office of Investigations HQ
1200 Pennsylvania Ave NW Mailcode 2431T
Washington, DC 20460

Hotline - 202-566-2476 or 888-546-8740
Hotline Fax 202-566-2599 Web Address oiig_hotline@epa.gov

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From: (b) (6), (b) (7)(C) .com [mailto:(b) (6), (b) (7)(C) .com]
Sent: Wednesday, June 14, 2017 1:37 PM
To: (b) (6), (b) (7)(C) <(b) (6), (b) (7)(C)@epa.gov>
Cc: (b) (6), (b) (7)(C) .com
Subject: OIG: RE: docket EPA-HQ-OPP-2016-0385 (glyphosate SAP) FIFRA
Importance: High

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

MISUSE OF TAXPAYER FUNDING. In short, the EPA gave wrong information to the National Pesticide Information Center. The National Pesticide Information Center failed to do its own due diligence and misrepresented wrong information as being the "best available science using the weight of evidence." In short, it was a fraudulent use of taxpayers money.

(b) (6), (b) (7)(C)

SCIENTIFIC MISCONDUCT. The (b) (6), (b) (7)(C) stated that the EPA used the best available science and weight of evidence and had considered the relevant studies. (b) said that the EPA was considering the findings of the Scientific Panel which concluded that glyphosate is non-carcinogenic. (b) (6), (b) (7)(C)

[REDACTED]

(b) (6), (b) (7)(C)

[REDACTED]

The EPA team had not provided the best available science but it appeared to pick and choose the studies that would bring a predetermined outcome that glyphosate was non carcinogenic.

The EPA word smithed the statements to state that
there was inconclusive evidence,
based on the weight of evidence...
reviewed the studies..
included the studies and
found they were not relevant on p 181 (b) (6), (b) (7)(C)

[REDACTED]

there was not sufficient evidence to show glyphosate is carcinogenic...
'For the FIFRA Scientific Advisory Panel meeting, EPA proposed that
glyphosate is "not likely to be carcinogenic to humans at doses
relevant to human health risk assessment.'

(b) (6), (b) (7)(C)

[REDACTED]

(b) (6), (b) (7)(C)

[REDACTED]

The rejection of relevant studies, the presentation of select articles, the poor quality of EPA research used in the Weight of Evidence, the lack of current research in the evidence presented, the lack of independent research by the FIFRA 2016 committee, the rejection of relevant studies 'because they were in a foreign language', the problems with EPA methodology called into question in 2009/2010 as well as 2016 all point to potential scientific misconduct by the EPA. The EPA systematically rejected studies based on one element with which they disagreed, however in another case they cited the same study to show support for a different position. The 2009 peer scientific community called into question the EPAs methodology as failing to protect the public.

Thus one can conclude that the EPA probably is out of compliance with USC Title 40, Chapter1, Subchapter E, Part 180. In short, the EPA may have committed Scientific Misconduct and violated the federal law.

(b) (6), (b) (7)(C)

[REDACTED]

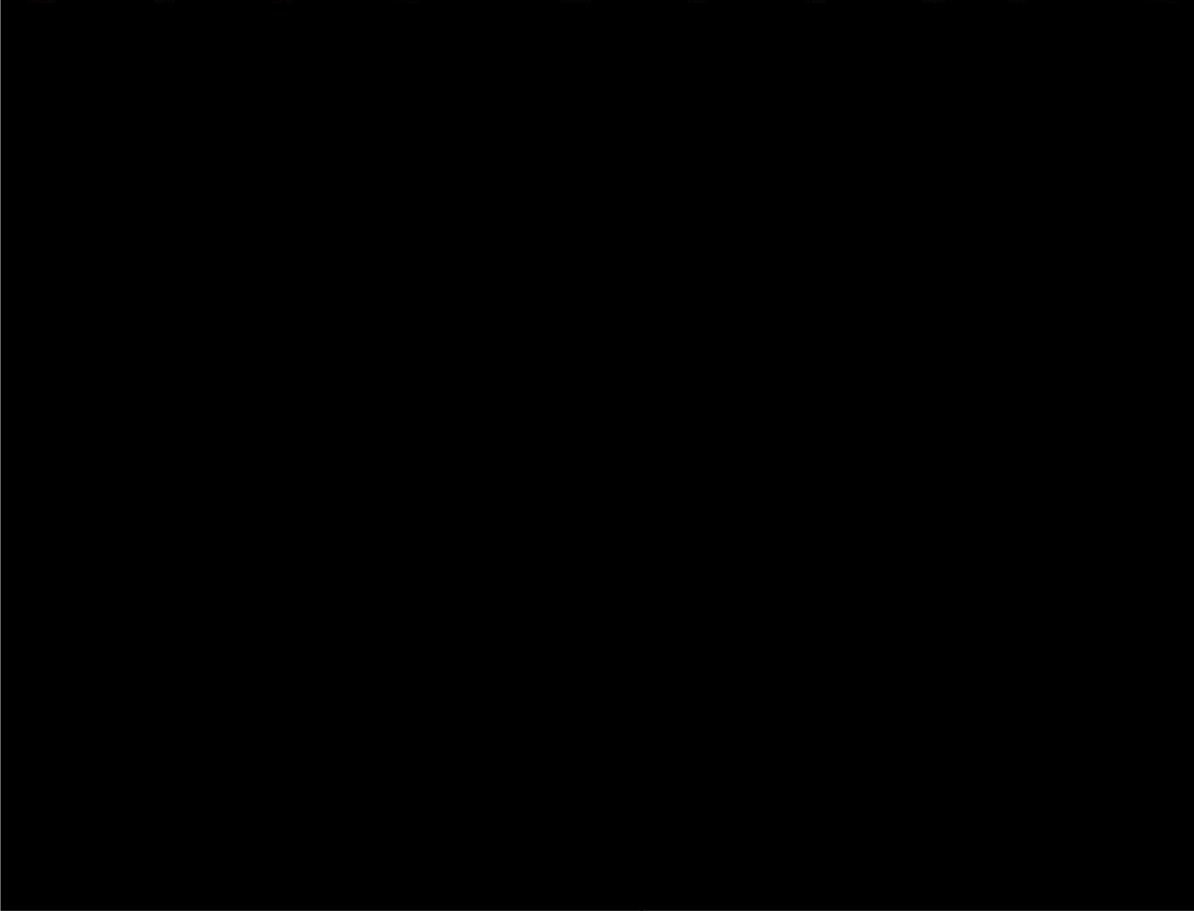
(b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)

(b) (6), (b) (7)

(b) (6), (b) (7)(C)



17 pages of hotline complaint removed pursuant to Exemptions (b)(6) and (b)(7)(C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

July 26, 2017

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0335

FROM: (b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)
Special Agent, (b) (6), (b) (7)(C)
Headquarters, Office of Inspector General

TO: Francesca Grifo
Scientific Integrity Official

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received an electronic message on June 14, 2017, from (b) (6), (b) (7)(C) .com. The message is reporting concerns with EPA Docket EPA-HQ-OPP-2016-03985, Glyphosate. This message was referred to the EPA, Office of Program Evaluation and Office of Investigation. The OIG will not be taking any action. It was recommended that it be forwarded to your office.

We established EPA OIG Hotline Number 2017-0335. We are referring this matter to your office for whatever action you determine necessary. Please inform the Hotline at (b) (6), (b) (7)(C) @epa.gov within the next 5 calendar days that this referral was received. In addition, it requested that any action from this Hotline be reported back to the OIG. Please do not hesitate calling me at (202) 566-(b) (6) if there are any questions.

Attachment:

(b) (6),
(b) (7)

From: (b) (6), (b) (7)(C) .com
Sent: Wednesday, June 14, 2017 1:37 PM
To: (b) (6), (b) (7)(C)
Cc: (b) (6), (b) (7)(C) .com
Subject: OIG: RE: docket EPA-HQ-OPP-2016-0385 (glyphosate SAP) FIFRA

Importance: High

(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)
[Redacted]

[Redacted]

MISUSE OF TAXPAYER FUNDING. In short, the EPA gave wrong information to the National Pesticide Information Center. The National Pesticide Information Center failed to do its own due diligence and misrepresented wrong information as being the "best available science using the weight of evidence." In short, it was a fraudulent use of taxpayers money.

(b) (6), (b) (7)(C)
[Redacted]

SCIENTIFIC MISCONDUCT. The (b) (6), (b) (7)(C) stated that the EPA used the best available science and weight of evidence and had considered the relevant studies. (b) (6), (b) (7)(C) said that the EPA was considering the findings of the Scientific Panel which concluded that glyphosate is non-carcinogenic. (b) (6), (b) (7)(C)

[Redacted]

(b) (6), (b) (7)(C)
[Redacted]

The EPA team had not provided the best available science but it appeared to pick and choose the studies that would bring a predetermined outcome that glyphosate was non carcinogenic.

The EPA word smithed the statements to state that
there was inconclusive evidence,
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there was not sufficient evidence to show glyphosate is carcinogenic...

'For the FIFRA Scientific Advisory Panel meeting, EPA proposed that glyphosate is "not likely to be carcinogenic to humans at doses relevant to human health risk assessment.'

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

The rejection of relevant studies, the presentation of select articles, the poor quality of EPA research used in the Weight of Evidence, the lack of current research in the evidence presented, the lack of independent research by the FIFRA 2016 committee, the rejection of relevant studies 'because they were in a foreign language', the problems with EPA methodology called into question in 2009/2010 as well as 2016 all point to potential scientific misconduct by the EPA. The EPA systematically rejected studies based on one element with which they disagreed, however in another case they cited the same study to show support for a different position. The 2009 peer scientific community called into question the EPAs methodology as failing to protect the public.

Thus one can conclude that the EPA probably is out of compliance with USC Title 40, Chapter1, Subchapter E, Part 180. In short, the EPA may have committed Scientific Misconduct and violated the federal law.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

----- Original Message -----

18 pages of duplicative hotline complaint removed pursuant to Exemptions (b)(6) and (b)(7)(C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

September 24, 2017

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0402

FROM: (b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)
Special Agent, Hotline Manager
Headquarters, Office of Inspector General

TO: Kevin Teichman
Acting Scientific Integrity Official

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received a forwarded electronic message that was sent to the EPA Administrator. The message is from (b) (6), (b) (7)(C), EPA, (b) (6), (b) (7)(C)

The message details allegations of science misconduct and sabotage. There are also requests for personnel actions that would not be under your jurisdiction,

We established EPA OIG Hotline Number 2017-0402. We are referring this matter to your office for whatever action you determine necessary. Please inform the Hotline at (b) (6), (b) (7)(C) [@epa.gov](mailto:(b) (6), (b) (7)(C)@epa.gov) within the next 5 calendar days that this referral was received. Please do not hesitate calling me at (202) 566-(b) (6) if there are any questions.

Attachment:

Tue Sep 19 14:13:07 EDT 2017

(b) (6), @epamail.epa.gov

FW: (b) (6), (b) (7)(C)

- NCEA GROSS MISMANAGEMENT

To: CMS.OEX@epamail.epa.gov

From: (b) (6), (b) (7)(C)

Sent: Tuesday, September 19, 2017 12:46 PM

To: Pruitt, Scott <Pruitt.Scott@epa.gov>

Subject: (b) (6), (b) (7)(C) - NCEA GROSS MISMANAGEMENT

Importance: High

Dear Mr. Pruitt,

(b) (6), (b) (7)(C) I would like to inform you that
(b) (6), (b) (7)(C) research is being sabotaged by NCEA management (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

It is clearly sabotage and retaliation to request now additional review in order to delay and possibly block the publication.

(b) (6), (b) (7)(C)

Thank you for your consideration!

(b) (6), (b) (7)(C)

From: (b) (6), (b) (7)(C)

Sent: Monday, September 18, 2017 2:43 PM

To: Pruitt, Scott <Pruitt.Scott@epa.gov>

Subject: NCEA GROSS MISMANAGEMENT

Importance: High

Dear Mr. Pruitt,

Congratulations on your new role as U.S. EPA Administrator! I am writing to you to express my concerns with the gross mismanagement and waste of funds that is ongoing in NCEA (National Center for Environmental Assessment) division of ORD, EPA. I (b) (6), (b) (7)(C)

It is alarming that diseases caused (to large extend) by environmental chemicals, as colorectal cancer, have increased prevalence in the last decade. The mission of NCEA is to produce health assessments of environmental chemicals, has been highly compromised due to gross mismanagement.

(b) (6), (b) (7)(C)

I want to inform you about major management problems at NCEA. The National Center for Environmental Assessment (NCEA) is a scientific organization that develops complex scientific projects. These projects require seasoned interpretation and analysis of biomedical research literature, that can only be completed by highly experienced research scientists with proven credentials. Completion of NCEA projects also requires ability to defend innovative scientific analysis to reviewers, that can only be accomplished by scientists that were at least able to defend their Ph.D. thesis. Nevertheless, **large part of the senior scientific leadership and NCEA staff lacks basic scientific credentials.** Many senior managers and staff members do not have Ph.D. nor solid scientific research record. As a result, the scientific leadership at NCEA is severely crippled. Projects are developed over decades, with huge contractor support and dozens of FTEs. These are projects that, if led by experienced and established scientists, can be successfully completed within two years. (b) (6), (b) (7)(C)

(b) (6),
(b) (7)


(b) (6), (b) (7)(C)

Examples of mismanagement:


(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

A horizontal black rectangular redaction box covering a line of text.

(b) (6), (b) (7)(C)

A large black rectangular redaction box covering the majority of the page content.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

December 20, 2017

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2018-0068

FROM: (b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)
Special Agent, Hotline Manager
Headquarters, Office of Inspector General

TO: Vincent Cogliano
Acting Scientific Integrity Official

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received your forwarded electronic message on November 8, 2017. This message was reviewed by the EPA OIG Office of Program Evaluation. This office reported back to the Hotline that no investigation, audit or evaluation would be opened by the EPA OIG. This Hotline is closed with no further action.

Please do not hesitate calling me at (202) 566-(b) (6) if there are any questions.

Attachment:

(b) (6), (b) (7)

From: Cogliano, Vincent
Sent: Wednesday, November 08, 2017 5:27 PM
To: Elkins, Arthur
Cc: Sinks, Tom; Alderton, Steven M.; Copper, Carolyn; (b) (6), (b) (7)(C)
Subject: PRIVILEGED AND CONFIDENTIAL: Allegation of a Loss of Scientific Integrity
Attachments: Report of an allegation of a violation of scientific integrity NBEP Octo....docx

Dear Inspector Elkins,

Francesca Grifo, EPA's Scientific Integrity Official, is on extended leave and I am serving as her backup.

I am writing to inform you about the attached allegation of a loss of scientific integrity, which I received from a group of EPA employees.

I am sending this to find out whether your office has an interest in investigating any part of this allegation or, if you prefer, that my office pursue the evaluation of the allegation.

Also, please let me know whether this is a protected action under the Whistleblower Protection Acts, both for the employees making the allegation and for the employees evaluating the allegation.

Tom Sinks, Director of the Office of the Science Advisor, and I met with Steve Alderton, EPA Whistleblower Protection Ombudsperson, on November 8th about this allegation.

Thank you for your attention to this matter.

Vincent Cogliano, PhD

Office of the Science Advisor
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW (8105R)
Washington DC 20460

REPORT OF AN ALLEGATION OF A LOSS OF SCIENTIFIC INTEGRITY AT EPA

November 7, 2017

(b) (6), (b) (7)(C)

Allegation

(b) (6), (b) (7)(C) reporting an Allegation of a Loss of Scientific Integrity¹. Three Ph.D. scientists employed by or affiliated to EPA ((b) (6), (b) (7)(C)) were prevented from presenting scientific results at the Narragansett Bay Estuary Program State of the Bay workshop in Providence, RI on October 23, 2017.

Specifically, cancellation of their presentations at this event was in violation of the first principle of Scientific Integrity in Section IV:

Ensure that the Agency's Scientific work is of the highest quality, free from political interference or personal motivations.

The policy also includes the following statement in Section IV.B Release of Scientific Information to the Public:

Scientific research and analysis comprise the foundation of all major EPA policy decisions. Therefore, the Agency should maintain vigilance toward ensuring that scientific research and results are presented openly and with integrity, accuracy, timeliness, and the full public scrutiny demanded when developing sound, high-quality environmental science. And, ...[t]o that end, the EPA strongly encourages and supports transparency and active, open communications through various forms including, but not limited to, publication in peer-reviewed or refereed journals, conference papers and presentations, media interviews, responses to Congressional inquiries, web postings, and news releases.

Section IV.B 3 states the following:

Under no circumstances, should the public affairs staff attempt to alter or change scientific findings or results. The role of the public affairs officer is to ensure that the science is plainly and cleanly communicated for the intended audience in a timely fashion.

Based on published information and corroborated by EPA colleagues, the Office of Public Affairs initiated the cancellation.

¹ The policy is found here: <https://www.epa.gov/osa/basic-information-about-scientific-integrity>

On a webinar on Tuesday October 24, EPA Scientific Integrity Officials stated that communicating scientific results is a key goal of the Scientific Integrity Policy and efforts to restrict communication of science would be taken very seriously.

Description

According to several news outlets, including the New York Times, the Washington Post and The Guardian, (b) (6), (b) (7)(C) [REDACTED] were prevented from presenting results of scientific studies they conducted at the Narragansett Bay Estuary Program State of the Bay workshop. The EPA is not denying this. The article in the NY Times, and elsewhere, cited (b) (6), (b) (7)(C) [REDACTED] who made the decision. In articles in the Washington Post and in The Guardian on October 24 after the event, an unnamed EPA official stated that the scientist's presentations were cancelled because: "this is not an EPA conference". (b) (6), (b) (7)(C) [REDACTED]

(b) (6), (b) (7)(C) [REDACTED], contacted the scientists on October 20 and also informed the organizers of the NBEP State of the Bay workshop that they were barred from making their presentations.

(b) (6), (b) (7)(C) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(b) (6), (b) (7)(C) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

How the allegation relates to loss of integrity and the impact of the loss of integrity

Until recently, EPA was considered among the most credible sources for environmental science information. In its report on Citizen Science published in December 2016, the National Advisory Council for Environmental Policy and Technology, an advisory committee to EPA, asserted that, "EPA is seen as the final arbiter of environmental and health science".² Science is considered a core principle at EPA;

² NACEPT. 2016. Environmental Protection Belongs to the Public A Vision for Citizen Science at EPA. EPA 219-R-16-001

virtually every decision we make is rooted in sound science, whether it is establishing a drinking water advisory level, or determining the appropriate remedy at a hazardous waste site.³ Our Office of Research and Development is among the largest environmental research laboratories in the world, and their research assists program offices and the general public. Preventing scientists from communicating their research diminishes this credibility.

Barring scientists from speaking, or even attending scientific conferences violates one of the core principles of science – communication. Part of the ongoing peer review process is to communicate results whether in person, as a speaker at a workshop, or in an academic journal.

Barring these scientists has sent a chilling message to scientists at EPA that some of their work is not considered credible by the Agency leaders, and subject to political influence. This risks objectivity in the way science is conducted, as well as the type of science conducted.

(b) (6), (b) (7)(C)

Finally, reporting the names of (b) (6), (b) (7)(C) that were barred from presenting their work may result in misperceptions about their work in the future.

Statement regarding personal or professional extenuating circumstances

(b) (6), (b) (7)(C)

Is this allegation being considered or submitted elsewhere?

It is possible that this allegation will be submitted by others, as the action was widely reported by local and national news outlets. In addition, on a recent webinar about the EPA Scientific Integrity Policy, participants on the call asked about the process for submitting an allegation related to this specific issue.

Conclusion

We are concerned that this action, combined with other similar actions from the administration, is continuing a troubling pattern of stifling science at EPA. The only way EPA's Science Integrity Policy can live up to its name, is to acknowledge that this is a mistake the Agency will not repeat.

³ The Science Integrity Policy in Section B states: "Scientific research and analysis comprise the foundation of all major EPA policy decisions."

Attachment 1. Email invitation:

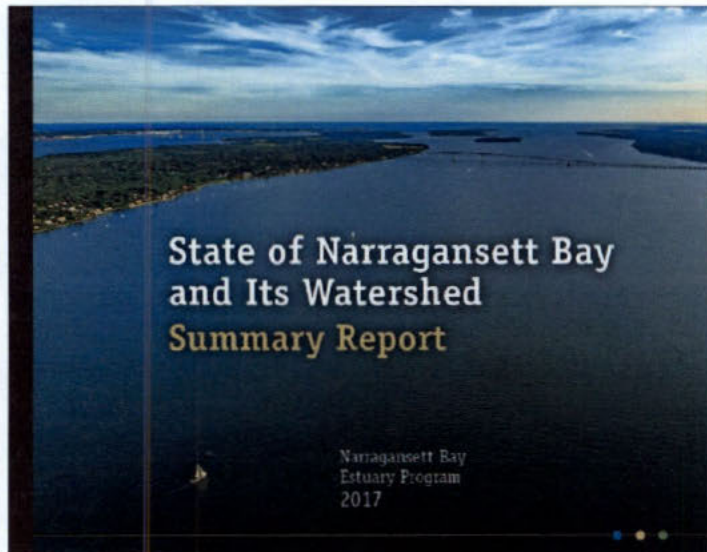
Good afternoon friends of Narragansett Bay and its watershed,

On behalf of the Narragansett Bay Estuary Program, you are cordially invited to attend the **State of Narragansett Bay and Its Watershed Workshop**. The Narragansett Bay Estuary Program brought together more than 50 practitioners from universities, organizations, and agencies in a bi-state effort by Massachusetts and Rhode Island to collaborate on the 2017 *State of Narragansett Bay and Its Watershed* technical report (see report [here](#)). The October 23rd workshop will include the official launch of the 2017 *State of Narragansett Bay and Its Watershed Summary Report* and will feature an array of distinguished speakers and panelists (see agenda below)

When: Monday, October 23, 2017, 12:30 p.m. to 2:30 p.m.

Where: Save The Bay Center, 100 Save The Bay Drive, Providence, Rhode Island

RSVP: If you are interested in attending this workshop, please [RSVP](#) by sending an email to: info@nbep.org.



Agenda

Welcome (b) (6), (b) (7)(C)

Remarks: State of Narragansett Bay and Its Watershed - (b) (6), (b) (7)(C)

Keynote Address: Narragansett Bay as a Sentinel Estuary - (b) (6), (b) (7)(C)

Panel Discussions

Moderator - (b) (6), (b) (7)(C)

Panel 1 - Reduction of Nitrogen and Phosphorus Loadings and the Future Implications of Rising Temperatures and More Intense Precipitation

- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)

Panel 2 - The Present and Future Biological Implications of Climate Change

- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)
- (b) (6), (b) (7)(C)

The Narragansett Bay Estuary Program is one of 28 programs designated as estuaries of national significance under the [National Estuary Program](#). The program helps protect and restore the water quality and ecological integrity of Narragansett Bay and its watershed.

This project was funded by agreements (CE96172201, CE96184201, CE00A00004, and CE00A00127) awarded by the Environmental Protection Agency to the New England Interstate Water Pollution Control Commission in partnership with the Narragansett Bay Estuary Program. Although the information in this document has been funded wholly or in part by the United States Environmental Protection Agency under agreements CE96172201, CE96184201, CE00A00004, and CE00A00127 to NEIWPCC, it has not undergone the Agency's publications review process and therefore, may not necessarily reflect the views of the Agency and no official endorsement should be inferred. The viewpoints expressed here do not necessarily represent those of the Narragansett Bay Estuary Program, NEIWPCC, or EPA nor does mention of trade names, commercial products, or causes constitute endorsement or recommendation for use.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

NARRAGANSETT BAY ESTUARY PROGRAM